

Message

From: Levine, Bradley (ENRD) [Bradley.Levine@usdoj.gov]
Sent: 11/22/2021 6:33:49 PM
To: Herb, Dawn [dherb@pa.gov]; Williams, Janna [jannwillia@pa.gov]
CC: Lazos, Pamela [Lazos.Pamela@epa.gov]
Subject: RE: [External] RE: CRW Consent Decree Draft to send to CRW on 11/22

Privileged & Confidential Common Interest Material

Thanks, Happy Thanksgiving. I will get that out in the next hour or two.

Bradley L. Levine
Senior Attorney
Environmental Enforcement Section
Environment & Natural Resources Division
U.S. Department of Justice
Work: 202-514-1513
Mobile: 202-305-5884

<u>First Class Mail</u>	<u>Express Mail</u>
P.O. Box 7611	150 M. St. N.E.
Washington, DC 20044	Room 2.900
	Washington, DC 20002

From: Herb, Dawn <dherb@pa.gov>
Sent: Monday, November 22, 2021 1:29 PM
To: Levine, Bradley (ENRD) <Bradley.Levine@usdoj.gov>; Williams, Janna <jannwillia@pa.gov>
Cc: Lazos, Pamela <lazos.pamela@epa.gov>
Subject: RE: [External] RE: CRW Consent Decree Draft to send to CRW on 11/22

I have not had time to review it but I trust the input from others and do not want to delay you sending it to Fred. So, please proceed. Thank you!

Dawn M. Herb | Regional Counsel
She/her/hers
Department of Environmental Protection | Southcentral Regional Office
909 Elmerton Ave. | Harrisburg, PA 17110
Phone: 717.705.4817 | Fax: 717.772.2400
www.dep.pa.gov

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

From: Levine, Bradley (ENRD) <Bradley.Levine@usdoj.gov>
Sent: Monday, November 22, 2021 1:16 PM
To: Williams, Janna <jannwillia@pa.gov>; Herb, Dawn <dherb@pa.gov>
Cc: Lazos, Pamela <lazos.pamela@epa.gov>
Subject: [External] RE: CRW Consent Decree Draft to send to CRW on 11/22

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.

Privileged & Confidential Common Interest Material

Dawn and Janna,

Do you expect to weigh in today on the final draft of the CD? If you concur I would like to send it out. If you need more time -- no worries, I know I asked for a quick turn-around -- just let me know please so that I can plan accordingly and coordinate with Fred as needed.

Thanks,
Brad

Bradley L. Levine
Senior Attorney
Environmental Enforcement Section
Environment & Natural Resources Division
U.S. Department of Justice
Work: 202-514-1513
Mobile: 202-305-5884

<u>First Class Mail</u>	<u>Express Mail</u>
P.O. Box 7611	150 M. St. N.E.
Washington, DC 20044	Room 2.900
	Washington, DC 20002

From: Levine, Bradley (ENRD)

Sent: Friday, November 19, 2021 2:56 PM

To: Lazos, Pamela <Lazos.Pamela@epa.gov>; Maslowski, Steven <Maslowski.Steven@epa.gov>; Nanda, Sushila <Nanda.Sushila@epa.gov>; Maria Bebenek <mbebenek@pa.gov>; Janna Williams <jannwillia@pa.gov>; Dawn Herb <dherb@pa.gov>; Landis, Victor <vlandis@pa.gov>; Tom Rowlett <tom.rowlett@pgenv.com>; Kardeman, Lianna <Kardeman.Lianna@epa.gov>

Cc: Ahearn, Devon (ENRD) <Devon.Ahearn@usdoj.gov>

Subject: CRW Consent Decree Draft to send to CRW on 11/22

Privileged & Confidential Common Interest Material
Attorney-Client Communication / Litigation Work Product

Team,

Please see the attached redline and clean copy of the draft CD to send to CRW. I spoke with Fred today and let him know we would try to send it Monday of next week.

This draft has been scrubbed of our internal comments, and only contains notes to CRW. Also, it includes suggested edits from PG to paragraphs 15.b., 20.a., and 20.b.

I also made a general comment to Appendix B that we think it should be in a Table, and I think we should send Victor's table in Draft form along with the decree. Fred flagged that they have some updates to this information which will be good; I told them we thought it should be a table that makes it easier to follow (so I don't think they will be surprised if we send Victor's table).

Please let me know if you concur, and I will then send to Fred on Monday.

I will be on leave next week, but want to send this to Fred. I will check email/voicemail on Monday and coordinate with folks here as needed.

Thanks,
Brad

Bradley L. Levine

ED_006335_00000924-00002

Senior Attorney
Environmental Enforcement Section
Environment & Natural Resources Division
U.S. Department of Justice
Work: 202-514-1513
Mobile: 202-305-5884

<u>First Class Mail</u>	<u>Express Mail</u>
P.O. Box 7611	150 M. St. N.E.
Washington, DC 20044	Room 2.900
	Washington, DC 20002